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Oregon

John A. Kitzhaber, M.D., Governor

Department of Environmental Quality

Northwest Region
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VIA FACSIMILE - Hard Copy to Follow

August 9, 2001

Ms. Judy Linton
U.S. Army Corps of Engineers
P.O. Box 2946
Portland, OR 97208-2946

RE: - Permit Applications 2001-00688 and 2001-00689

Dear Ms. Linton

The Oregon Department of Environmental Quality (DEQ) Voluntary Cleanup and Portland Harbor Section is submitting the following comments on the U.S. Army Corps of Engineers Permit Applications 2001-00688 and 2001-00689. Permit Applications 2001-00688 and 2001-00689 authorize dredging activities at Port of Portland Terminals 2 and 5. These two Port of Portland facilities are located on the Willamette River between Willamette Falls and the confluence of the Willamette and Columbia rivers. This reach of the Willamette River is adjacent to the Portland Harbor Superfund Site as defined in the listing package prepared by the U.S. Environmental Protection Agency (EPA) and is considered within the Portland Harbor study area.

A multi-agency team is working on the Portland Harbor Superfund Site including DEQ, EPA, Tribes and Natural Resource Trustee agencies. EPA is the lead agency for investigating contaminated sediments through the Portland Harbor remedial investigation and feasibility study (RI/FS). DEQ is the Support Agency for this in-water sediment work. Due to the potential environmental impacts from dredging in or near areas of sediment contamination, it is imperative that the Portland Harbor Team has an active role prior to, during and after implementation of dredging activities within the lower Willamette River.

In general, all dredging activities taking place between Willamette Falls and the confluence of the Willamette and Columbia Rivers must include:

- Appropriate characterization of the material to be dredged and the dredge horizon following dredging.
- Appropriate controls to prevent releases of contamination to the environment during implementation of the dredging project.
- Proper management of the dredged material following removal.
- Coordination with the Portland Harbor Team.
- An assessment of the dredging project on the Portland Harbor RI/FS.

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OPTIONAL FORM 99 (7-99)

FAX TRANSMITTAL

of pages 3

To *Paul Quinn*
Dept./Agency

From *Judy Linton*
Phone #

Fax #

Fax #

DEQ-1

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Specifically, DEQ recommends that Permit Applications 2001-00688 and 2001-00689 be modified to include the following provisions:

- IF YOU READ PERMIT
- Require development of appropriate characterization plans for the material to be removed as well as the post dredging dredge horizon. Both the Terminal 2 and 5 projects indicate that sediment characterization is underway. (We would like to review this data as soon as it is available. DEQ is part of RMT)
 - Require development of appropriate management plans addressing implementation of the dredging project. Based on the permit application, the material will be going to the rehandling facility located at Terminal 6. A description of how water will be managed from potentially contaminated sediments, how the sediments will be placed, etc. should be submitted for review prior to implementation of the dredging projects. WQ management plan
 - Require development of appropriate management plans addressing the final disposition of the dredged material.
 - Require the submittal of all plans and data to the Portland Harbor Team. This information should be submitted far enough in advance of the planned dredging activity to allow adequate Portland Harbor Team review time.
 - Require the submittal of sufficient information such that the impact of the dredging project on the Portland Harbor RI/FS can be evaluated. This information will be used by EPA in the design and implementation of the Portland Harbor remedial investigation and feasibility study (RI/FS) and cleanup activities. Applicat available

In addition, we request that information on any necessary consultation under the Endangered Species Act (ESA) also be provided to the Portland Harbor Team.

The above comments are submitted in conjunction with DEQ's role as support agency for the Portland Harbor Superfund Site. We appreciate the opportunity to provide comments on Permit Applications 2001-00688 and 2001-00689 and consider this as a first step in enhanced coordination between the Portland Harbor Team and the U.S. Army Corps of Engineers. DEQ welcomes further discussion on the coordination of dredging activities within the lower Willamette River.

If you have any questions about these comments, please contact me at (503) 229-5648.

Sincerely,



Eric Blischke
Portland Harbor Technical Coordinator
Voluntary Cleanup and Portland Harbor

Ms. Judy Linton
U.S. Army Corps of Engineers
August 9, 2001

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Cc: Mike Resen, NWR/DEQ
Kim Cox, NWR/DEQ
Tom Gainer, NWR/DEQ
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Lynne Perry, DOJ
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Brad Nye, Warm Springs
Anne Watanabe, Yakama
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Audie Huber, Umatilla
Tom Downey, Siletz
Billy Barquin, Siletz
Patti Howard, Nez Perce
Kathleen Feehan, Grande Ronde
Rick Kepler, ODFW

- Taken Appropriate steps
- Staff / Consultants that professional knowledge we have done due diligence
- Taking out of River
- Process of maintenance ~~dredging~~ dredging
- AOC / SOW
- IF you had read permit application

 HIP HUMPHREY
 VALLY

8/16/01

SOW CONCEPT - Comments Come to EPA after ~~at~~ Trustee, EPA, get applicatio
 Concept not followed by DETQ

- ① Satisfy concerns
- ② Letter taken Back